



ENVIRONMENTAL PROTECTION AGENCY RO II

State of New Jersey JAN 15 PM 3: 14

Christine Todd Whitman Governor Department of Environmental Protection
DECA-WATER COMPLI. BR.

Robert C. Shinn, Jr. Commissioner

JAN 1 0 1997

Bureau of Underground Storage Tanks CN-433

> 401 East State Street Trenton, NJ 08625-0433

CERTIFIED MAIL
RETURN RECEIPT REQUESTED AND
FACSIMILE

Mr. Barry Kronman
Deleet Merchandising Corporation
26 Blanchard Street
Newark, N. J. 07105

Re: Deleet Merchandising Corporation (DMC)
26 Blanchard Street
Newark, Essex County
Case # 91-09-12-1519 UST # 0061328

Enviro-Sciences, Inc. (ESI), letter Dated December 13, 1996

Dear Mr. Kronman:

This letter is in response to ESI's December 13, 1996, request for a meeting regarding the above referenced site. This request was submitted pursuant to the Dispute Resolution Procedure in accordance with P.L. 1993, c.139 (S-1070, Section 41).

The Department will grant a meeting only after all the following information is supplied. Please be advised, that the following items detailed below, shall be completed within thirty (30) calendar days:

 DMC is required to <u>secure written approval</u> from any and all subsurface utilities companies (ie: gas lines, storm sewers, sanitary sewers, water lines, telephone lines, vaults etc.) located along Blanchard Street for the purposes of conducting a subsurface peroxide injection program.

For the two high pressure 16 inch and 12 inch gas lines, please direct correspondence to PSE&G, Mr. Richard Blackman, Principal Environmental Analyst and Peter Collette, General Manager, at 80 Park Plaza, Mailcode 25A, Newark N.J. 07102-4194.

2. DMC is required to <u>secure written approval</u> from local government authorities, (Police, Fire, Health Officer, etc) to conduct a subsurface peroxide injection program at the site.

Note: For items 1 and 2 above, the Department shall be copied on all correspondence. The information provided to the local government and utility companies shall fully explain the technical details (chemical and exothermic reactions, etc.) associated with this proposal.

3. DMC must submit a complete Remedial Action Workplan (RAW) addendum proposal to the Department for review of peroxide treatment of the ground water contamination at the site. In addition, DMC must technically address how the peroxide injection into the subsurface will be controlled without hydraulic control and how the peroxide injection will address the full vertical and horizontal extent of contamination.

This letter does not represent an extension or a modification of the time frames for compliance previously set forth in the Department's letters of September 23, 1996, December 5, 1996, December 28, 1995, the March 9, 1995 RAW approval letter, and other Department letters since the March 9, 1995 RAW approval. The Department reserves the right to implement all applicable enforcement measures.

DMC has been previously notified of their penalty and liability exposure for non-compliance under 40 CFR Part 280, N.J.S.A. 58:10-A-21 et seq. and N.J.A.C. 7:14B et seq.

Should DMC not complete all of the above listed items in accordance with the Department requirements, the Department will refer the case to the Bureau of Federal Case Management, Negotiations/Enforcement Support Unit for penalty assessment from December 15, 1996.

If you should have any questions regarding this matter, please contact David Nickerson, Case Manager at (609) 633-1445.

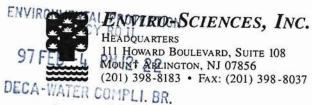
Sincerely,

Susan Boyle, Director

Division of Responsible Party Site Remediation.

Susan B. Boylen

c: David Nickerson Case Manager, CPG BUST Derval Thomas, EPA Region II John Gear, Enviro Sciences Inc.



Mr. Frank D'Ascencia Manager of Industrial Pollution Control Passaic Valley Sewer Commissioner 600 Wilson Avenue Newark, NJ 07105

Dear Mr. D'Ascencia:

Enviro-Sciences, Inc. (Enviro-Sciences) is an environmental consulting firm retained by Deleet Merchandising Corporation (DMC) to remediate contaminated groundwater under the DMC property located at 26 Blanchard Street, Newark. Prior to implementing the chosen remediation technique, the New Jersey State Department of Environmental Protection (NJDEP) has required that all utility companies and local government authorities be notified of the specific remedial technique that will be used. In addition, NJDEP is requesting that each utility company or local government authority provide its written acknowledgment of being notified and approval of the use of the remedial technique. The NJDEP's letter is attached. On behalf of DMC, Enviro-Sciences is seeking to obtain Passaic Valley Sewer Commissioner's acknowledgment of, and approval for, the proposed remediation technique described below.

The groundwater under the DMC property is contaminated with volatile organic compounds. The proposed remedial technique is in-situ peroxide treatment using a propriety process known as CleanOx®. The CleanOx® process involves the injection of propriety liquid chemical formulations through monitoring wells to the contaminated portions of the groundwater. The chemical reaction is essentially the Fenton's Reaction which involves the initial reaction of hydrogen peroxide with ferrous ion that leads to the breakdown of the organic compounds through the chemical process of oxidation. The only by-products of the reaction are water and carbon dioxide. This breakdown reaction will result in the production of some heat, but, because of the large volume of groundwater involved, any increase in temperature in the groundwater will be negligible. Attached is a detailed description of the CleanOx® process, including the chemistry of the reaction.

The monitoring wells that will be used at the site for the application of the CleanOx® method are 20 to 40 feet deep. Depth to groundwater ranges from 14 to 15 feet, along Blanchard Street. Passaic Valley Sewer Commissioner's facility in the area - a sanitary sewer pipe - is 13 to 15 feet below grade and may come in contact with the groundwater. The radial spread of the chemicals, from the point of entry into the groundwater, will be limited to 20 feet. The design of the remediation program will be done in a manner that ensures that the radial-spread is kept well within the DMC property boundary.

Very truly yours,

ENVIRO-SCIENCES, INC.

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John Gear

Project Manager

cc: Susan Boyle, Director - Division of Responsible Party Site Remediation, State of New Jersey Department of Environmental Protection

Derval Thomas, EPA Region II

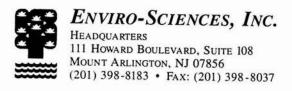
Irving Cohen, CEO, Enviro-Sciences, Inc.

Mathy V. Stanislaus, Esq., Director of Environmental Compliance, Enviro-Sciences, Inc.

Dear Mr. Gear:

This letter responds to your letter of January 28, 1997, regarding the proposed remediation project at Deleet Merchandising Corporation (DMC). By this letter, Passaic Valley Sewer Commissioner acknowledges that Enviro-Sciences has provided information regarding the CleanOx® process that will be used to remediate the groundwater aquifer under the DMC property. This information includes details regarding the chemical reaction involved in applying the technique. Furthermore, the Passaic Valley Sewer Commissioner approves of the use of CleanOx® for the remediation of the groundwater.

Name (printed)
Title
Signature



Mr. Paul Butler Engineering Department City of Newark 920 Broad Street, Room 410 Newark, NJ 07102

Dear Mr. Butler:

Enviro-Sciences, Inc. (Enviro-Sciences) is an environmental consulting firm retained by Deleet Merchandising Corporation (DMC) to remediate contaminated groundwater under the DMC property located at 26 Blanchard Street, Newark. Prior to implementing the chosen remediation technique, the New Jersey State Department of Environmental Protection (NJDEP) has required that all utility companies and local government authorities be notified of the specific remedial technique that will be used. In addition, NJDEP is requesting that each utility company or local government authority provide its written acknowledgment of being notified and approval of the use of the remedial technique. The NJDEP's letter is attached. On behalf of DMC, Enviro-Sciences is seeking to obtain the Engineering Department, City of Newark acknowledgment of, and approval for, the proposed remediation technique described below.

The groundwater under the DMC property is contaminated with volatile organic compounds. The proposed remedial technique is in-situ peroxide treatment using a propriety process known as CleanOx®. The CleanOx® process involves the injection of propriety liquid chemical formulations through monitoring wells to the contaminated portions of the groundwater. The chemical reaction is essentially the Fenton's Reaction which involves the initial reaction of hydrogen peroxide with ferrous ion that leads to the breakdown of the organic compounds through the chemical process of oxidation. The only by-products of the reaction are water and carbon dioxide. This breakdown reaction will result in the production of some heat, but, because of the large volume of groundwater involved, any increase in temperature in the groundwater will be negligible. Attached is a detailed description of the CleanOx® process, including the chemistry of the reaction.

The monitoring wells that will be used at the site for the application of the CleanOx® method are 20 to 40 feet deep. Depth to groundwater ranges from 14 to 15 feet, along Blanchard Street. The radial spread of the chemicals, from the point of entry into the groundwater, will be limited to 20 feet. The design of the remediation program will be done in a manner that ensures that the radial-spread is kept well within the DMC property boundary.

Very truly yours,

ENVIRO-SCIENCES, INC.

John Gear

Project Manager

cc: Susan Boyle, Director - Division of Responsible Party Site Remediation, State of New Jersey Department of Environmental Protection

Derval Thomas, EPA Region II

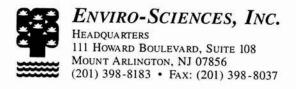
Irving Cohen, CEO, Enviro-Sciences, Inc.

Mathy V. Stanislaus, Esq. Director of Environmental Compliance, Enviro-Sciences, Inc.

Dear Mr. Gear:

This letter responds to your letter of January 28, 1997, regarding the proposed remediation project at Deleet Merchandising Corporation (DMC). By this letter, the Engineering Department, City of Newark acknowledges that Enviro-Sciences has provided information regarding the CleanOx® process that will be used to remediate the groundwater aquifer under the DMC property. This information includes details regarding the chemical reaction involved in applying the technique. Furthermore, the Engineering Department, City of Newark approves of the use of CleanOx® for the remediation of the groundwater aquifer.

Name (printed)	
Title	
 Signature	



Mr. Johnnie Jones Director of Redevelopment City of Newark 55 Liberty Street Newark, NJ 07102

Dear Mr. Jones:

Enviro-Sciences, Inc. (Enviro-Sciences) is an environmental consulting firm retained by Deleet Merchandising Corporation (DMC) to remediate contaminated groundwater under the DMC property located at 26 Blanchard Street, Newark. Prior to implementing the chosen remediation technique, the New Jersey State Department of Environmental Protection (NJDEP) has required that all utility companies and local government authorities be notified of the specific remedial technique that will be used. In addition, NJDEP is requesting that each utility company or local government authority provide its written acknowledgment of being notified and approval of the use of the remedial technique. The NJDEP's letter is attached. On behalf of DMC, Enviro-Sciences is seeking to obtain the Director of Redevelopment, City of Newark acknowledgment of, and approval for, the proposed remediation technique described below.

The groundwater under the DMC property is contaminated with volatile organic compounds. The proposed remedial technique is in-situ peroxide treatment using a propriety process known as CleanOx®. The CleanOx® process involves the injection of propriety liquid chemical formulations through monitoring wells to the contaminated portions of the groundwater. The chemical reaction is essentially the Fenton's Reaction which involves the initial reaction of hydrogen peroxide with ferrous ion that leads to the breakdown of the organic compounds through the chemical process of oxidation. The only by-products of the reaction are water and carbon dioxide. This breakdown reaction will result in the production of some heat, but, because of the large volume of groundwater involved, any increase in temperature in the groundwater will be negligible. Attached is a detailed description of the CleanOx® process, including the chemistry of the reaction.

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Very truly yours,

ENVIRO-SCIENCES, INC.

John Gear

Project Manager

cc: Susan Boyle, Director - Division of Responsible Party Site Remediation, State of New Jersey Department of Environmental Protection

Derval Thomas, EPA Region II

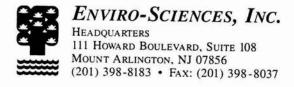
Irving Cohen, CEO, Enviro-Sciences, Inc.

Mathy V. Stanislaus, Esq. Director of Environmental Compliance, Enviro-Sciences, Inc.

Dear Mr. Gear:

This letter responds to your letter of January 28, 1997, regarding the proposed remediation project at Deleet Merchandising Corporation (DMC). By this letter, the Director of Redevelopment, City of Newark acknowledges that Enviro-Sciences has provided information regarding the CleanOx® process that will be used to remediate the groundwater aquifer under the DMC property. This information includes details regarding the chemical reaction involved in applying the technique. Furthermore, the Director of Redevelopment, City of Newark approves of the use of CleanOx® for the remediation of the groundwater aquifer.

Name (printed)
Title
Signature



Mr. Bob Swales Newark Emergency Management One Lincoln Avenue Room 206A Newark, NJ 07104

Dear Mr. Swales:

Enviro-Sciences, Inc. (Enviro-Sciences) is an environmental consulting firm retained by Deleet Merchandising Corporation (DMC) to remediate contaminated groundwater under the DMC property located at 26 Blanchard Street, Newark. Prior to implementing the chosen remediation technique, the New Jersey State Department of Environmental Protection (NJDEP) has required that all utility companies and local government authorities be notified of the specific remedial technique that will be used. In addition, NJDEP is requesting that each utility company or local government authority provide its written acknowledgment of being notified and approval of the use of the remedial technique. The NJDEP's letter is attached. On behalf of DMC, Enviro-Sciences is seeking to obtain Newark Emergency Management's acknowledgment of, and approval for, the proposed remediation technique described below.

The groundwater under the DMC property is contaminated with volatile organic compounds. The proposed remedial technique is in-situ peroxide treatment using a propriety process known as CleanOx®. The CleanOx® process involves the injection of propriety liquid chemical formulations through monitoring wells to the contaminated portions of the groundwater. The chemical reaction is essentially the Fenton's Reaction which involves the initial reaction of hydrogen peroxide with ferrous ion that leads to the breakdown of the organic compounds through the chemical process of oxidation. The only by-products of the reaction are water and carbon dioxide. This breakdown reaction will result in the production of some heat, but, because of the large volume of groundwater involved, any increase in temperature in the groundwater will be negligible. Attached is a detailed description of the CleanOx® process, including the chemistry of the reaction.

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Very truly yours,

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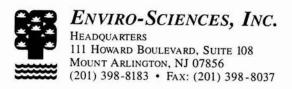
Derval Thomas, EPA Region II

Irving Cohen, CEO, Enviro-Sciences, Inc.

Mathy V. Stanislaus, Esq. Director of Environmental Compliance, Enviro-Sciences, Inc.

Dear Mr. Gear:

This letter responds to your letter of January 28, 1997, regarding the proposed remediation project at Deleet Merchandising Corporation (DMC). By this letter, Newark Emergency Management acknowledges that Enviro-Sciences has provided information regarding the CleanOx® process that will be used to remediate the groundwater aquifer under the DMC property. This information includes details regarding the chemical reaction involved in applying the technique. Furthermore, Newark Emergency Management approves of the use of CleanOx® for the remediation of the groundwater aquifer.



Mr. Richard Blackman Principal Environmental Analyst PSE&G 80 Park Place Mailcode 25A Newark, NJ 07102-4194

Dear Mr. Blackman:

Enviro-Sciences, Inc. (Enviro-Sciences) is an environmental consulting firm retained by Deleet Merchandising Corporation (DMC) to remediate contaminated groundwater under the DMC property located at 26 Blanchard Street, Newark. Prior to implementing the chosen remediation technique, the New Jersey State Department of Environmental Protection (NJDEP) has required that all utility companies and local government authorities be notified of the specific remedial technique that will be used. In addition, NJDEP is requesting that each utility company or local government authority provide its written acknowledgment of being notified and approval of the use of the remedial technique. The NJDEP's letter is attached. On behalf of DMC, Enviro-Sciences is seeking to obtain PSE&G's acknowledgment of, and approval for, the proposed remediation technique described below.

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The monitoring wells that will be used at the site for the application of the CleanOx® method are 20 to 40 feet deep. Depth to groundwater ranges from 14 to 15 feet, along Blanchard Street. PSE&G's facilities in the area are approximately 8 to 9 feet above the depth at which groundwater is found. The radial spread of the chemicals, from the point of entry into the groundwater, will be limited to 20 feet. The design of the remediation program will be done in a manner that ensures that the radial-spread is kept well within the DMC property boundary.

Very truly yours,

ENVIRO-SCIENCES, INC.

John Hear

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Project Manager

cc: Susan Boyle, Director - Division of Responsible Party Site Remediation, State of New

Jersey Department of Environmental Protection

Derval Thomas, EPA Region II

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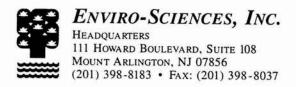
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Name (printed)
Title
Signature



Mr. Peter Collette General Manager PSE&G Principal Environmental Analyst 80 Park Place Mailcode 25A Newark, NJ 07102-4194

Dear Mr. Collette:

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The monitoring wells that will be used at the site for the application of the CleanOx® method are 20 to 40 feet deep. Depth to groundwater ranges from 14 to 15 feet, along Blanchard Street. PSE&G's facilities in the area are approximately 8 to 9 feet above the depth at which groundwater is found. The radial spread of the chemicals, from the point of entry into the groundwater, will be limited to 20 feet. The design of the remediation program will be done in a manner that ensures that the radial-spread is kept well within the DMC property boundary.

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Project Manager

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Susan Boyle, Director - Division of Responsible Party Site Remediation, State of New Jersey Department of Environmental Protection

Derval Thomas, EPA Region II

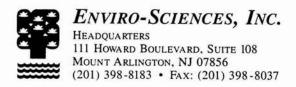
Irving Cohen, CEO, Enviro-Sciences, Inc.

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Name (pr	rinted)
Title	
Signature	



Mr. William Zengel PSE&G 150 Circle Avenue Clifton, NJ 07011

Dear Mr. Zengel:

Enviro-Sciences, Inc. (Enviro-Sciences) is an environmental consulting firm retained by Deleet Merchandising Corporation (DMC) to remediate contaminated groundwater under the DMC property located at 26 Blanchard Street, Newark. Prior to implementing the chosen remediation technique, the New Jersey State Department of Environmental Protection (NJDEP) has required that all utility companies and local government authorities be notified of the specific remedial technique that will be used. In addition, NJDEP is requesting that each utility company or local government authority provide its written acknowledgment of being notified and approval of the use of the remedial technique. The NJDEP's letter is attached. On behalf of DMC, Enviro-Sciences is seeking to obtain PSE&G acknowledgment of, and approval for, the proposed remediation technique described below.

The proposed remedial technique is in-situ peroxide treatment using a propriety process known as CleanOx®. The CleanOx® process involves the injection of propriety liquid chemical formulations through monitoring wells to the contaminated portions of the groundwater. The chemical reaction is essentially the Fenton's Reaction which involves the initial reaction of hydrogen peroxide with ferrous ion that leads to the breakdown of the organic compounds through the chemical process of oxidation. The only by-products of the reaction are water and carbon dioxide. This breakdown reaction will result in the production of some heat, but, because of the large volume of groundwater involved, any increase in temperature in the groundwater will be negligible. Attached is a detailed description of the CleanOx® process, including the chemistry of the reaction.

The monitoring wells that will be used at the site for the application of the CleanOx® method are 20 to 40 feet deep. Depth to groundwater ranges from 14 to 15 feet, along Blanchard Street. PSE&G facilities in the area are approximately 8 to 9 feet above the depth at which groundwater is found. The radial spread of the chemicals, from the point of entry into the groundwater, will be limited to 20 feet. The design of the remediation program will be done in a manner that ensures that the radial-spread is kept well within the DMC property boundary.

Very truly yours,

ENVIRO-SCIENCES, INC.

John Gla

John Gear

Project Manager

cc: Susan Boyle, Director - Division of Responsible Party Site Remediation, State of New Jersey Department of Environmental Protection

Derval Thomas, EPA Region II

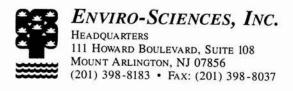
Irving Cohen, CEO, Enviro-Sciences, Inc.

Mathy V. Stanislaus, Esq. Director of Environmental Compliance, Enviro-Sciences,

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N	Name (printed)	
Г	Title	
	Signature	_



Mr. Alan Rosen District Engineering PSE&G 444 St. Pauls Avenue Jersey City, NJ 07306

Dear Mr. Rosen:

Enviro-Sciences, Inc. (Enviro-Sciences) is an environmental consulting firm retained by Deleet Merchandising Corporation (DMC) to remediate contaminated groundwater under the DMC property located at 26 Blanchard Street, Newark. Prior to implementing the chosen remediation technique, the New Jersey State Department of Environmental Protection (NJDEP) has required that all utility companies and local government authorities be notified of the specific remedial technique that will be used. In addition, NJDEP is requesting that each utility company or local government authority provide its written acknowledgment of being notified and approval of the use of the remedial technique. The NJDEP's letter is attached. On behalf of DMC, Enviro-Sciences is seeking to obtain PSE&G acknowledgment of, and approval for, the proposed remediation technique described below.

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Very truly yours,

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ENVIRO-SCIENCES, INC.

John Gear

Project Manager

cc: Susan Boyle, Director - Division of Responsible Party Site Remediation, State of New Jersey Department of Environmental Protection

Derval Thomas, EPA Region II

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Mathy V. Stanislaus, Esq. Director of Environmental Compliance, Enviro-Sciences, Inc.

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Name (printed)
Title
 Signature